

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

NORTHERN DIVISION

2005 SEP 28 A 9:13

RECEIVED
J. L. HARRIS, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

CHARLES A. KEGLER,
AIS # 127802
Plaintiff,

vs:

civil action no. 2:05-cv-619-f

GWENDOLYN MOSLEY, et.al.,
Defendants

REQUEST FOR PRODUCTION OF DOCUMENTS
UNDER RULE 34

Plaintiff request defendant Gwendolyn Mosley to respond within 30 days to the following request:

1) That the defendant produce and permit Plaintiff to inspect and to copy each of the following documents:

A) The monthly , semi annual or annual billing from the city of Clio, Al 36107 for the water supplied to Easterling Correctional Facility, 200 Wallace dr. Clio, Al 36017.

B) The contract entered into between the Department of Corrections and the City of Clio, Al. for the treatment of all sewage and waste water originating at Easterling Correctional Facility, 200 Wallace dr. , Clio, Al. 36017

C) All plans and specifications applying to sewage collection, treatment and disposal as was submitted to the State Board of Health pursuant to the Code of Alabama 1975 ,title 22-26-3.

D) All applications and or permits issued by the Alabama Department of Environmental Management for the operation, construction of and or modifications to the water storage tank located at Easterling Correctional Facility, 200 Wallace dr. Clio, Al 36017

E) The last 12 bacteriological, sanitary and or chemical analysis reports for the water being supplied to Esaterling

Correctional Facility 200 Wallace dr. Clio Al 36017.

F) All applications and or permits issued by the Alabama Department of Environmental Management for the operation, construction of and or modifications to the elevated water storage tank referred to as well and tank # 4 by the City of Clio, Alabama 36017, such permits are required by the Code of Alabama 1975 title 22-23-41.

G) All reports memorandums or internal audits, conducted by the Department of Corrections , and specifically reports from the State Auditors concerning co-payments for inmate initiated medical services .

F) all opinions from the Alabama Attorney General concerning the legality of the medical co-payment.

Done on this 26th day of September 2005

Charles A. Kegler
Charles A. Kegler
200 Wallace dr.
Clio, Al. 36017

CERTIFICATE OF SERVICE

I herby certify that I have this day served a copy on the persons who's address's are below by placing same in the prison legal mail system at Easterling Correctional Facility.

ATTORNEY FOR DEFENDANTS
Alabama Attorney General
11 South Union Street
Montgomery , Alabama
36130-0152

Done on this 26th day of September 2005

Charles A. Kegler
Charles A. Kegler
200 Wallace dr.
Clio, Al